

DOCKET FILE COPY ORIGINAL

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

**RECEIVED**

JUL 20 2001

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Jurisdictional Separations Reform and  
Referral to the Federal-State Joint Board

CC Docket No. 80-286

COMMENTS  
of the  
GENERAL SERVICES ADMINISTRATION

GEORGE N. BARCLAY  
Associate General Counsel  
Personal Property Division

MICHAEL J. ETTNER  
Senior Assistant General Counsel  
Personal Property Division

GENERAL SERVICES ADMINISTRATION  
1800 F Street, N.W., Room 4002  
Washington, D.C. 20405  
(202) 501-1156

Economic Consultants:  
Snively King Majoros O'Connor & Lee, Inc.  
1220 L Street, N.W., Suite 410  
Washington, D.C. 20005

July 20, 2001

No. of Copies rec'd 014  
LDA B C D E

## Table of Contents

|   | <b><u>Page No.</u></b> |
|---|------------------------|
| Summary.....  | i                      |
| I. Introduction.....  | 1                      |
| II. Network Access Service Revenue Subaccounts Should Be Separated..... | 3                      |
| III. Conclusion.....  | 5                      |

## **SUMMARY**

In these Comments, GSA supports the Bureau's proposed streamlining of the Separations Report for the duration of the freeze on Part 36 category relationships and jurisdictional cost allocation factors.

GSA does recommend one change, however, to the Bureau's proposals. GSA recommends that the Separations Report be revised to divide state network access service revenue between end user, switched and special. This change will allow the elimination of the state access USOA account, while providing the subaccount detail requested by GSA and the state commissions.

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

In the Matter of

Jurisdictional Separations Reform and  
Referral to the Federal-State Joint Board

CC Docket No. 80-286

**COMMENTS  
of the  
GENERAL SERVICES ADMINISTRATION**

The General Services Administration ("GSA") submits these Comments on behalf of the customer interest of all Federal Executive Agencies ("FEAs") in response to the Commission's Public Notice ("Notice") released on June 22, 2001. In the Notice, the Commission seeks comments and replies on a streamlined Separations Report (ARMIS 43-04).

**I. INTRODUCTION**

Pursuant to Section 201(a)(4) of the Federal Property and Administrative Services Act of 1949, as amended, 40 U.S.C. 481(a)(4), GSA is vested with the responsibility to represent the customer interests of the FEAs before Federal and state regulatory agencies. The FEAs require a wide array of interexchange and local telecommunications services throughout the nation. From their perspective as end users, the FEAs have consistently supported the Commission's efforts to bring the

benefits of competitive markets to consumers of all telecommunications services. Until such time as competition provides an effective control over Incumbent Local Exchange Carrier ("ILEC") prices, however, GSA believes that the Commission must continue to maintain rules which ensure just and reasonable rates.

In an earlier phase of this proceeding, GSA urged the Commission to require ILECs to continue to report separations results for the duration of the freeze on Part 36 category relationships and jurisdictional cost allocation factors.<sup>1</sup> In its Report and Order, the Commission cited GSA's comments, adopted continued reporting and directed the Common Carrier Bureau ("Bureau") to seek comment on a streamlined Separations Report.<sup>2</sup>

GSA commends the Bureau for its proposed reduction of the Separations Report from 63 to 7 pages.<sup>3</sup> In these Comments, GSA will recommend only one revision to the Bureau's proposal.

---

<sup>1</sup> Comments of GSA, September 25, 2000, pp. 8-9; Reply Comments of GSA, October 10, 2000, pp. 6-9.

<sup>2</sup> Report and Order, FCC 01-162, released May 22, 2001, para. 43-47.

<sup>3</sup> Notice, p. 1.

## II. NETWORK ACCESS SERVICE REVENUE SUBACCOUNTS SHOULD BE SEPARATED

On page 7 of its proposed Separations Report, the Bureau shows the following rows for Network Access Service Revenues ("NASR"):

| ROW  | Category      | SUBJ. TO SEP | STATE | INTERSTATE |
|------|---------------|--------------|-------|------------|
| 4010 | NASR-End User |              | N/A   |            |
| 4011 | NASR-Switched |              | N/A   |            |
| 4012 | NASR-Special  |              | N/A   |            |
| 4013 | NASR-State    |              |       | N/A        |
| 4014 | NASR-TOTAL    |              |       |            |

As with current reporting, the Bureau's proposal would divide interstate NASR into end user, switched and special, but report intrastate NASR only in total.

In marked contrast to the Bureau's proposal, in the Accounting Proceeding the state commissions recommended that the Commission establish the same three subaccounts for intrastate NASR as for interstate NASR.<sup>4</sup> GSA supported this state commission proposal in its Accounting Proceeding Comments.<sup>5</sup>

---

<sup>4</sup> 2000 Biennial Regulatory Review- Comprehensive Review of the Accounting Requirements and ARMIS Reporting Requirement for Incumbent Local Exchange Carriers: Phase 2 and Phase 3, CC Docket No. 00-199 ("Accounting Proceeding"), para. 16 and Appendix 5.

<sup>5</sup> Id., Comments of GSA, December 21, 2000, p. 5.

On June 8, 2001, the Commission released a Public Notice seeking additional comments on its proposed changes to the Uniform System of Accounts ("USOA").<sup>6</sup> The Accounting Notice proposed the elimination of the state NASR account (row 4013 in the above table). As GSA noted in its response to the Accounting Notice, this proposal is only appropriate if the Separations Report is revised to divide state NASR between end user, switched and special.<sup>7</sup> GSA recommends, therefore, that page 7 of the Bureau's proposed Separations Report be revised to show the following:

| ROW  | Category      | SUBJ TO SEP | STATE | INTERSTATE |
|------|---------------|-------------|-------|------------|
| 4010 | NASR-End User |             |       |            |
| 4011 | NASR-Switched |             |       |            |
| 4012 | NASR-Special  |             |       |            |
| 4013 | NASR-TOTAL    |             |       |            |

Adoption of GSA's recommendation will allow the elimination of the state NASR USOA account, while providing the subaccount detail requested by GSA and the state commissions.

<sup>6</sup> Public Notice, DA 01-1403, released June 8, 2001 ("Accounting Notice").

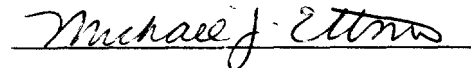
<sup>7</sup> Accounting Proceeding, Comments of GSA, July 16, 2001, pp. 4-5.

### III. CONCLUSION

As a major user of telecommunications services, GSA urges the Commission to implement the recommendation set forth in these Comments.

Respectfully submitted,

GEORGE N. BARCLAY  
Associate General Counsel  
Personal Property Division



MICHAEL J. ETTNER  
Senior Assistant General Counsel  
Personal Property Division

GENERAL SERVICES ADMINISTRATION  
1800 F Street, N.W., Rm. 4002  
Washington, D.C. 20405  
(202) 501-1156

July 20, 2001



## CERTIFICATE OF SERVICE

I, MICHAEL J. ETTNER, do hereby certify that copies of the foregoing "Comments of the General Services Administration" were served this 20<sup>th</sup> day of July, 2001, by hand delivery or postage paid to the following parties.

The Honorable Michael K. Powell  
Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

The Honorable Gloria Tristani  
Commissioner  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

The Honorable Michael J. Copps  
Commissioner  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

The Honorable Kathleen Q. Aberthany  
Commissioner  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

The Honorable Kevin J. Martin  
Commissioner  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W. TW-A325  
Washington, D.C. 20554

Editorial Offices  
Telecommunications Reports  
1333 H Street, N.W., Room 100-E  
Washington, D.C. 20005

Ms. Edith Herman  
Senior Editor  
Communications Daily  
2115 Ward Court, N.W.  
Washington, D.C. 20037

International Transcription Service  
1231 20<sup>th</sup> Street, N.W.  
Washington, D.C. 20036

Ernestine Creech  
Accounting Safeguards Division  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W. – Room 6-C317  
Washington, D.C. 20554

Michael J. Ettner